

RECEIVED

MAR 22 2021

AT 8:30
WILLIAM T. WALSH
CLERK

3. 18. 2021

Friday

Serdar Tatar

FOI Memphis, P.O. Box 3830

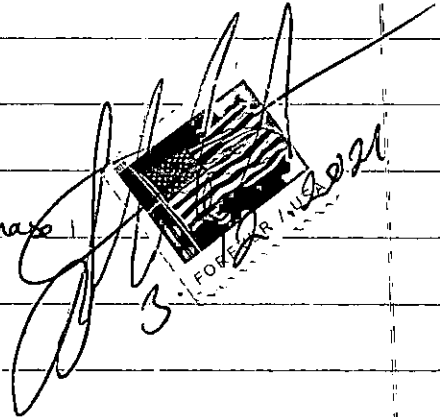
Memphis TN 38134

Honorable Robert B. Kugler

Room 6040, Mitchell H. Cohen Federal Courthouse

One John F. Gerry Plaza

400 Cooper St. Camden New Jersey 08101



Re: Serious Potential Conflict of Interest (United States v. Tatar, 07-459 (S) (RBK))

Dear Respective Judge,

I am writing this missive to raise an objection, and awareness of a Serious Potential Conflict of Interest. In my previous letter, I basically raised the objection, of the prosecution communicating with the FBI without a representative overseeing those communications to protect my interest in the matter and I requested for an appointment of counsel to address the issue.

However, it became clear to me after review of my records, that A.U.S.A. Norman Gross is one of the prosecutors,

→ who was involved in the prosecution of the United States v. Tatar, 07-459; and accused of misconduct in the motion. It would be very inappropriate, and in conflict of interest for Norman Gross, or any other A.U.S.A. who was involved in the prosecution of Tatar, supra, to be involved with the investigation, of essentially themselves, (United States v. Bolden, 353 F.3d 870, 878 (10th cir. 2003) (The disqualification of Government Counsel is a drastic measure), United States v. Zagausi, 374 F. Appx 295, 297 (3d. Cir. 2010), see also, Vega, 317 F. Supp. 2d at 602 (In the rare circumstance in which [a defendant] raises credible allegation of a prosecutor's conflict of interest or other relationship that would create the appearance of an improper motivation in the prosecution, the court must undertake a careful balancing of proper considerations of judicial administration...) quoting United States v. Zamichieli, 2015 U.S. Dist Lexis 76786.

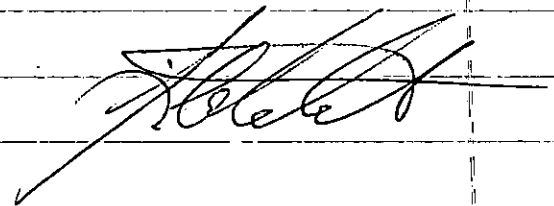
Your honor, because of the foregoing I am respectfully requesting the removal and disqualification of A.U.S.A. Norman Gross, or any other A.U.S.A. who have had any involvement in the prosecution in this matter at pre-arrest post arrest, pre-trial, at trial or thereafter to be involved in the investigation of the accusations in the

→ Motion for 'Outrageous Government Conduct' due to conflict of interest.

Finally, I repeat my request for appointment of counsel, for the court to hold an evidentiary hearing, and additionally, for the court to order for the preservation of all records of the communications that have been conducted by the office of the A.U.S.A. concerning the motion presently in discussion.

I thank you very kindly for your attention to this very important matter.

Respectfully,



SERDAR TATAR,
FBI Memphis, P.O. Box 34550
Memphis, TN 38134

Sender tolar, Case 8:07-cr-00459-RBK

FBI Memphis, P.O. Box 34550

Memphis TN 38134



RECEIVED
MAR 22 2021
AT 030
WILLIAM L WALSH
CLERK

Clerk of the Court
Mitchell H. Cohen Federal Courthouse
One John F. Gerry Plaza
400 Cooper St
Camden New Jersey 08101

Legal Mail (if returned open only in presence of the inmate)